

JOE HILL
Hill Law Offices
Susupe Village
P.O. Box 500917
Saipan, MP 96950

Tel: (670) 234-6806/7743
Fax: (670) 234-7753

**IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS**

ABELLANOSA, JOANNA, et al.,

Plaintiffs,

v.

**L&T INTERNATIONAL
CORPORATION,**

Defendant.

Civil Action No. 05-0010

**DECLARATION OF JOE HILL IN
SUPPORT OF PLAINTIFFS' BILL
OF COSTS**

I, JOE HILL, hereby declare as follows:

1. I am counsel for the 76 Plaintiffs in the above-entitled action.
2. I am over the age of eighteen years old, have personal knowledge of the facts set forth herein, am competent to testify as to these facts if called as a witness in a court of law, and if called would testify as stated herein.
3. Given the 5 day period under Rule 54(d) counsel endeavored to locate and obtain declarations from each plaintiff. However counsel was unable to contact or locate all plaintiffs within this short period of time.
4. As the court was previously made aware some of the plaintiffs are no longer in the CNMI.
5. Fifty one (51) of the plaintiffs in the CNMI have executed declarations supporting

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Hill Law Offices
P.O. Box 500917 ~ Saipan CM-MP 96950 ~
TEL. NO. (670) 234-6860/7743 ~ FAX: 234-7753

1 plaintiffs' bill of costs and opposing Defendant's Bill of Costs based on their individual lack
2 of funds or ability to pay costs as demanded by their former employer L&T.

3 6. If given more time counsel can reasonable obtain the additional declarations of plaintiffs.

4 7. The arrangement and understanding that I had with Attorney Thompson for his noticed
5 deposition of Babe Lopez in Manila, was that because of the short extended time period the
6 court had given for plaintiffs to file their supplemental opposition and affidavits, Attorney
7 Thompson was to expedite the transcription of the audio-video transcripts in time for use by the
8 parties relative to plaintiffs' supplemental oppositions and affidavits.

9 8. Attorney Thompson to my knowledge never provided a written transcript of Ms. Lopez's
10 deposition to me. See Verified/amended Opposition to Defendant's Motion for Summary
11 Judgment and Plaintiffs' Cross-Motion for Summary Judgment dated September 29, 2006, p.11;
12 supplemental rule 56(f) Affidavit of Joe Hill dated September 29, 2006.

13 I declare under the penalty of perjury that the foregoing is true to the best of my
14 knowledge and belief and that I have reviewed plaintiffs' Bill of Costs prepared by Alma Ng,
15 the accountant in my office and believe the amounts are correct and have been necessarily
16 incurred in the case; that the services for which fees have been charged were actually and
17 necessarily performed; and that this declaration was executed on November 2, 2006, at Susupe
18 village, Island of Saipan, Commonwealth of the Northern Mariana Islands.

19 Dated this 2nd day of November, 2006.

22 /s/ _____

23 **JOE HILL**
24 Declarant